

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE ANNUITY, WELFARE, APPRENTICESHIP SKILL  
IMPROVEMENT & SAFETY FUNDS of the  
INTERNATIONAL UNION OF OPERATING ENGINEERS,  
LOCAL 15, 15A, 15C and 15D, AFL-CIO by its TRUSTEES  
JAMES T. CALLAHAN, WILLIAM H. HARDING,  
LYNN A. MOUREY and ROBERT SHAW, and JOHN and  
JANE DOE, as Beneficiaries of the ANNUITY, WELFARE,  
APPRENTICESHIP SKILL IMPROVEMENT & SAFETY  
FUNDS of the INTERNATIONAL UNION OF OPERATING  
ENGINEERS, LOCAL 15, 15A, 15C and 15D, AFL-CIO,

Plaintiffs,

-against-

DELL-TECH ENTERPRISES, INC.,

Defendant.  
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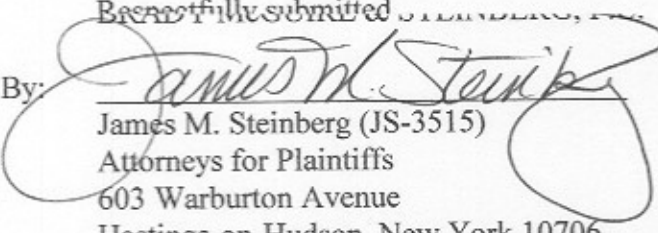
**NOTICE OF MOTION  
FOR DEFAULT JUDGMENT**

07-CIV-6157 (GBD)

**PLEASE TAKE NOTICE**, that upon the Affidavit of JAMES M. STEINBERG, ESQ.,  
sworn to on the 14<sup>th</sup> day of August, 2007, Plaintiffs' Statement of Damages, and upon all of the  
prior papers and proceedings heretofore served and had herein, Plaintiffs, by their attorneys BRADY  
McGUIRE & STEINBERG, P.C., will move this court, at the United States Courthouse located at  
500 Pearl Street, New York, New York, before the Honorable George B. Daniels, at a date and time  
to be scheduled by the Court, for a judgment of default against Defendant DELL-TECH  
ENTERPRISES, INC. pursuant to Rule 55(a) of the Federal Rules of Civil Procedure in the amount

of \$11,903.80, together with such other and further relief as this Court may deem just, proper and equitable.

Dated: Hastings-on-Hudson, New York  
August 14, 2007

Respectfully submitted,  
By:   
James M. Steinberg (JS-3515)  
Attorneys for Plaintiffs  
603 Warburton Avenue  
Hastings-on-Hudson, New York 10706  
(914) 478-4293

TO: DELL-TECH ENTERPRISES, INC.  
One Pinnacle Drive  
Dix Hills, New York 11746